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**TECHNICAL REVIEW DOCUMENT**  
**for**  
**OPERATING PERMIT 95OPYU060**  
to be issued to:

Southern Star Central Gas Pipeline, Inc.  
Yuma Station  
Yuma County  
Source ID 1250017

Geoffrey D. Drissel Review Engineer  
Revised for Renewal September 5, 2002

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**I. Purpose**

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued November 1, 1997, and expires on November 1, 2002. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted November 1, 2001. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

**II. Source Description**

This source is classified as a natural gas transmission facility defined under Standard Industrial Classification 4922. Gas is compressed to specification for transmission to sales pipelines using a single internal combustion engine

powering four (4) compressor units. The only other activity on site is an emergency shutdown device (ESD), used to release natural gas to the atmosphere in an emergency, and fugitive VOC emissions.

The facility is located just outside of the rural town of Yuma in Yuma County, Colorado. The area is designated as attainment for all criteria pollutants. Kansas is designated as an affected state located within a 50 mile radius of the facility. There are no Federal Class I areas within 100 kilometers of the facility. This source is minor with respect to Prevention of Significant Deterioration (PSD) requirements where PSD is triggered at 250 TPY of an attainment criteria pollutant. Facility wide emissions are as follows:

<b>Pollutant</b>	<b>Potential To Emit (TPY)</b>	<b>2000 Actual Emissions (TPY)</b>
NO <sub>x</sub>	239.9	209
CO	26.1	23
VOC	13.0	11

Potential emissions are based upon 8760 hours/year of operation at maximum capacity. Actual emissions of NO<sub>x</sub>, CO, SO<sub>2</sub>, and PM<sub>10</sub> are based upon the last Air Pollution Emission Notices (APENs) received by the Division. VOC values are based upon emissions from the combustion of natural gas and the ESD device only and do not include fugitive VOC (see explanation below). Updated APENs were received on 10/31/01 giving 2000 Actual values. This facility is required to provide an updated APEN in the event that emissions of any of the above air pollutants increase 5% or 50 tons per year, whichever is less, above the level reported on the last APEN submitted to the APCD. The Division assumes that emissions from this facility have remained the same or decreased since the last APEN submittal based upon the compliance certification in the operating permit renewal application. Since this facility is not a major source of HAPs, it is not subject to either Subpart HH or Subpart HHH of the National Emission Standards for Hazardous Air Pollutants and it is not subject to Section 112(j) of 40CFR part 63.

### **III. Discussion of Modifications Made**

#### **Source Requested Modifications**

The source requested that several changes be made to the renewal Operating Permit. Those requested changes included the following:

- an increase in the annual fuel usage limit for Unit S00
- a revision of the first semi-annual report due date from May 1 to June 1 each year
- deletion of the stack test condition for Unit S001

These requests have been incorporated into the renewal Operating Permit.

#### Other Modifications

The Division has included additional changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Southern Star Central - Yuma Renewal Operating Permit. These changes are as follows:

#### Page following Cover Page

The dates for monitoring and compliance periods have been clarified, i.e. changed "November - April" to "November 1- April 30".

Monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

The citation (above "issued to" and "plant site location") on the page following the cover page provides the incorrect title for the state act. The title was changed from "Colorado Air Quality Control Act" to "Colorado Air Pollution Prevention and Control Act". In addition, the dates were removed from the citation.

#### Section I - General Activities and Summary

The language in Condition 1.3 was changed based on comments made by EPA on other Operating Permits.

Revised the language in Condition 3.1 to more appropriately address the PSD status of the source.

Added Section 4 that states the applicability of the Accidental Release Prevention Program (112(r)).

Added Section 5 for compliance assurance monitoring (CAM); note that no emission units are subject to CAM.

## Section II - Specific Permit Terms

The following changes were made to the specific requirements of Unit

- The short term limits were removed.
- The emission calculation language was revised to reflect the current version.
- Reference to specific ASTM methods was removed.
- The opacity compliance language regarding the presumption of compliance with the opacity standard if natural gas is used as fuel was updated to reflect the current version.
- The portable monitoring language was revised to reflect the current version.

## Section III – Permit Shield

- The title for Section 1 was changed from “Specific Conditions” to “Specific Non-Applicable Requirements” and a new section 3 was added for subsumed (streamlined) conditions. Note that there were no streamlined conditions.
- Based on comments made by EPA on another permit, the following statement was added after the introductory sentence in Section 1 “This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance”.
- In addition, the following phrase “In addition, this shield does not protect the source from any violations that occur as a result of any modification or

reconstruction on which construction commenced prior to permit issuance” was added to the end of the introductory paragraph in Section 1.

- Based on comments made by EPA on another permit, the following phrase was added to the beginning of the introductory sentence “Based upon the information available to the Division and supplied by the applicant.”

#### Section IV - General Conditions

- Added an “and” between the Reg 3 and C.R.S. citations in General Condition 4 (compliance requirements).
- The language contained in the Common Provisions Regulation regarding upsets was included in General Condition 3.
- The citation in General Condition 8 (fees) was changed to cite the Colorado Revised Statute. In addition, any specific identification of a fee (i.e. \$100 APEN fee) or citation of Reg 3 was removed and replaced with the language “...in accordance with the provisions of C.R.S. [appropriate citation].”
- The citation in General Condition 14 (odor) was corrected. In addition, the phrase “Part A” was added to the citation for Condition 14 (odor). Colorado Regulation No. 2 was revised and a Part B was added to address swine operations. Colorado Regulation No. 2, Part B should not be included as a general condition in the Operating Permit.
- The reference in Condition 29 (volatile organic compounds) to Regulation No. 7, Section III.C.3 was corrected to Regulation No. 7, Section VIII.C.3.
- Added the requirements in Colorado Regulation No. 7, Section V.B (disposal of volatile organic compounds) to General Condition 29.

#### Appendices

- First Page of Appendices – The phrase “except as otherwise provided in the permit” was added after the word “enforceable” in the disclaimer at the request of EPA.
- Appendix B and C were replaced with revised Appendices.

- The EPA addresses in Appendix D were corrected.